



U.S. Department of Justice

United States Attorney Southern District of New York

The Silvio J. Mollo Building One Saint Andrew's Plaza New York, New York 10007

March 9, 2023

MEMO ENDORSED

BY ECF AND EMAIL

The Honorable Sidney H. Stein
United States District Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

Re: United States v. Untra Jones, 13 Cr. 836 (SHS)

Dear Judge Stein:

The Government writes to respectfully request that the Court schedule a conference at the Court's earliest convenience to modify the conditions of the defendant's supervised release pursuant to Rule 32.1 of the Federal Rules of Criminal Procedure and Title 18, United States Code, Section 3142. As explained below, at the conference the Government intends to seek the defendant's detention pending the resolution of the alleged violations of supervised release.

Over the past eight months, the defendant, who is currently on supervised release and at liberty in the community, has demonstrated a pattern of non-compliance and committed crimes. On December 6, 2022, the United States Probation Office for the Southern District of New York ("Probation") issued a violation report (the "December 6, 2022 Report") setting forth two specifications pertaining to the defendant's possession with intent to sell narcotics. On January 4, 2023, the parties appeared before the Court; at this conference, the Court scheduled a hearing on the specifications contained in the December 6, 2022 Report for March 9, 2023.

On March 7, 2023, the defense filed a letter motion requesting that the Court adjourn the hearing set for March 9, 2023, to a date in the week of April 10, 2023. Dkt. No. 430. The Court granted that request the following day.

On March 8, 2023, Probation issued another violation report (the "March 8, 2023 Report"). The March 8, 2023 Report sets forth three additional specifications—unlawful possession of a debit card belonging to another individual, assault of a romantic partner, and use of marijuana—that the defendant committed *after* the January 4, 2023 conference. *See* March 8, 2023 Report at 5-7. In the March 8, 2023 Report, Probation also recommends that the Court issue a summons for the defendant's appearance. *Id.* at 3. In light of the additional violations contained in the March 8, 2023 Report and, more broadly, the defendant's significant history of non-compliance with the terms of his supervised release, the Government respectfully requests that the Court

schedule a conference at the Court's earliest convenience, at which the Government intends to seek detention pending the resolution of the alleged violations of supervised release. *See* 18 U.S.C. §§ 3142(g), 3148(b).

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York

By:

Brandon C. Thompson Assistant United States Attorney

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cc: Sam A. Schmidt, (by ECF and email)

There will be a conference in this matter on Tuesday, March 14, 2023, at 2:30 p.m.

Dated: New York, New York March 10, 2023

SO ORDERED:

Sidney H. Stein, U.S.D.J.